

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

IN RE: NJ STATEWIDE MANAGEMENT, INC.)

Debtor

)
)

Case No. 15-24743-JKS

Chapter 11

NOTICE OF MOTION TO BE RELIEVED OF COUNSEL

PLEASE TAKE NOTICE that the undersigned attorney for Debtor NJ Statewide Management, Inc. shall apply to the above named Court on Monday, November 21, 2016 at 10:00 a.m. or as soon thereafter as counsel can be heard for an Order relieving Noah M. Burstein the attorney for Debtor NJ Statewide Management, Inc.

PLEASE TAKE FURTHER NOTICE, that the undersigned shall rely upon the annexed Certification of Noah M. Burstein, Esq.

NOAH M. BURSTEIN
Attorney for NJ Statewide Management, Inc.
1244 Sussex Road
Teaneck, New Jersey 07666

CERTIFICATION ON NOAH M. BURSTEIN

Noah M. Burstein, certifies as follows:

1. I am an Attorney at Law of the State of New Jersey and of this Court and represent the debtor NJ Statewide Management.

2. I am fully familiar with this matter and make this certification in support of my motion to be relieved as counsel.

3. I have represented the Debtor since July 27, 2015 when I met the principal of the company AMIR ZAKHARY.

4. I prepared a Chapter 11 Petition at Mr. Zakhary's request in order to try and prevent loss of 2 properties owned by the Debtor at 216 Cambridge Avenue, Jersey City, NJ and 134 Boyd Avenue, Jersey City, NJ. Both are residential houses with 2 or 3 units. Pursuant to Mr. Zakhary these are the only assets of the company.

5. Unfortunately, soon after filing the petition, Mr. Zakhary returned to his native Egypt. Communication with him was very difficult. The only means of communication with him was by way of text messages.

6. I had to plead with Mr. Zakhary to return to the United States for trustee meetings and the like.

7. Mr. Zakhary never provided me with bank statements or records of rent payments and expenses, or any other documents, except for copies of landlord/tenant complaints from years past as well as multiple fire and building violations from Jersey City regarding the property at 216 Cambridge Avenue.

8. During the course of my representation of the Debtor, Mr. Zakhary has remained difficult to communicate with. Frequently I would send him texts which would

remain unanswered. Mr. Zakhary advised me that he was back in Egypt in June - July 2016.

9. As to the property in Jersey City the Court entered an order vacating the automatic stay and a Sheriff's sale was held on or about July 23, 2016 at which time the property was sold.

10. I met with the client thereafter and he stated he wished to contest the sale. I prepared a letter to the Sheriff of Hudson County who conducted the sale on the basis that the purchaser at the Sheriff sale had not consummated the sale by paying the balance of the bid.

11. Nevertheless, the client contacted me shortly thereafter and asked to pick up his file and obtain other counsel. I accordingly released the file to Mr. Zakhary on or about August 19, 2016.

12. I have not received a Substitution of Attorney from any other attorney. However, it is clear that Mr. Zakhary has discharged me.

13. In view of all of the above I request that the Court discharge me from further representation of the Debtor.

I certify that the foregoing statements of fact made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: October 01, 2016

NOAH M. BURSTEIN, ESQ.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

In Re:
NJ STATE MANAGEMENT INC.

Case No.: 15-24743 JKS
Chapter: 11
Hearing Date: _____
Judge: SHERWOOD

CAPTION OF ORDER

The relief set forth on the following pages, numbered two (2) through _____ is
ORDERED.

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Noah M. Burstein, Esquire is hereby relieved of counsel in the within matter.

Honorable John K. Sherwood

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

In Re:
NJ Statewide Management, Inc
Debtor

Case No.: 15-24743-JKS
Chapter: 11
Adv. No.: _____
Hearing Date: Nov. 1, 2016
Judge: Sherwood

CERTIFICATION OF SERVICE

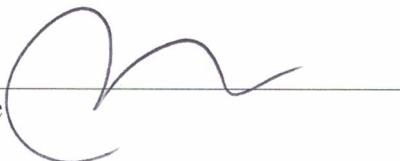
1. I, Noah M. Burstein :

- represent Debtor in this matter.
 am the secretary/paralegal for _____, who represents _____ in this matter.
 am the _____ in this case and am representing myself.

2. On October 21, 2016, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below.

3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Date: 10/21/16

Signature 

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
NJ Statewide Management, Inc. 216 Cambridge Avenue Jersey City, NJ 07307		<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input checked="" type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ <small>(As authorized by the Court or by rule. Cite the rule if applicable.)</small>
NJ Statewide Management, Inc. 134 Boyd Avenue Jersey City, NJ 07304		<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input checked="" type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ <small>(As authorized by the Court or by rule. Cite the rule if applicable.)</small>
David A. Wolff, Esq. 396 Route 34 Matawan, NJ 07747		<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>Fax 732-566-1192</u> <small>(As authorized by the Court or by rule. Cite the rule if applicable.)</small>
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ <small>(As authorized by the Court or by rule. Cite the rule if applicable.)</small>
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ <small>(As authorized by the Court or by rule. Cite the rule if applicable.)</small>